

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

COURTNEY HARNESS)	CASE NO. 1:22cv01422
)	
Plaintiff,)	JUDGE DAVID RUIZ
)	
v.)	<u>UNOPPOSED MOTION TO</u>
)	<u>SUBSTITUTE PROPER PARTY</u>
UNIVERSITY HOSPITALS HEALTH)	<u>DEFENDANT BY</u>
SYSTEMS, INC.)	<u>INTERLINEATION AND</u>
)	<u>CORRECT CASE CAPTION</u>
Defendant.)	

Plaintiff Courtney Harness, by and through undersigned counsel, hereby moves for an Order as follows:

1. Defendant is currently named as “University Hospitals Health Systems, Inc” (“UHHS”). Due to a clerical error identifying the structural organization of Plaintiff’s former employer, Plaintiff was actually employed by University Hospitals Cleveland Medical Center (“UHCMC”) at all times relevant to this action. As such, UHCMC is a proper party to be named as a Defendant in this case.
2. In its Answer to the Complaint in this matter, UHHS asserted an affirmative defense that Plaintiff had named the wrong Defendant in this matter. Since then, counsel for Defendant has notified Plaintiff that the proper Defendant is UHCMC.
3. University Hospitals Health Systems, Inc. shall be substituted through interlineation University Hospitals Cleveland Medical Center as the Defendant in this case. All prior references to University Hospitals Health Systems, Inc shall be read to reference University Hospitals Cleveland Medical Center.
4. The caption of this case shall be affected by the substitution University Hospitals Health Systems, Inc for University Hospitals Cleveland Medical Center.

5. Defendant has indicated that it does not oppose correcting the identity of Defendant through interlineation.

WHEREFORE, based on the foregoing reasons, Plaintiff Courtney Harness respectfully request that the Court grant this Motion and order the Clerk of Courts to amend the case caption accordingly.

Respectfully submitted,

/s/Chris P. Widodo

Chris P. Widodo (0090441)

SPITZ, THE EMPLOYEE'S ATTORNEY

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CERTIFICATE OF SERVICE

I certify that the foregoing was served via the Court's electronic filing system on December 15, 2022. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

/s/ Chris P. Widodo

Chris P. Widodo (0090441)

SPITZ, THE EMPLOYEE'S ATTORNEY